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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHAD BETTS,

Case No.: 2:22-cv-02162-JCM-EJY

Plaintiff,

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT (FIRST REQUEST)**

CLARITY SERVICES, INC., EXPERIAN
INFORMATION SOLUTIONS, INC., FAY
SERVICING, LLC.

Defendants.

Plaintiff, Chad Betts (“Plaintiff”), and Defendant, Fay Servicing, LLC (“Defendant”) (collectively “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

On January 18, 2023, Plaintiff filed his First Amended Complaint [ECF No. 4]. Defendant was served with Plaintiff's First Amended Complaint on January 23, 2023. The deadline for Defendant to respond to Plaintiff's First Amended Complaint is February 13, 2023. The Parties have discussed extending the deadline for Defendant to respond to Plaintiff's First Amended Complaint to allow for better investigation of the allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to file its responsive pleading to Plaintiff's First Amended Complaint to March 15, 2023.

This is the first motion for an extension of time for Defendant to file its responsive

1 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
2 any other party.

3 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that
4 occurs during the pendency of this extension.

5 DATED this 26th day of January, 2023.

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7 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

8 /s/ Ramir M. Hernandez

9 Ramir M. Hernandez, Esq.
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11 Attorneys for Defendant, Fay Servicing, LLC

/s/ Gerardo Avalos

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12 Attorneys for Plaintiff, Chad Betts

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IT IS SO ORDERED:

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18 UNITED STATES MAGISTRATE JUDGE
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20 DATED: January 26, 2023

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